

RE: LANCE KEVIN OSTROWSKI

) Case No. 16 B 34839

)

Debtor) Chapter 13

)

) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

LANCE KEVIN OSTROWSKI

SULAIMAN LAW GROUP LTD

via Clerk's ECF noticing procedures

821 S PROSPECT AVE

PARK RIDGE, IL 60068

Please take notice that on November 13, 2019 at 10:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the person(s) named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on October 22, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO OBJECT TO DISCHARGE

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to enter an order determining that debtor is not entitled to a discharge, stating as follows:

1. Debtor (s) filed the above-captioned Chapter 13 case on October 31, 2016.
2. The debtor(s) filed a previous Chapter 7 case, # 14-02073 filed on Jan 23, 2014, discharge having been issued on May 06, 2014.
3. Pursuant to 11 U.S.C. § 1328 (f), "the court shall not grant a discharge of all debts provided for in the plan or disallowed under section 502, if the debtor received a discharge--
 - (1) in a case filed under chapter 7, 11, or 12 of this title during the 4-year period preceding the date of the order for relief under this chapter, or
 - (2) in a case filed under chapter 13 of this title during the 2-year period preceding the date of such order."

WHEREFORE Trustee prays that the Court enter an order that the debtor or debtors are not entitled to a discharge.

Respectfully submitted,

TOM VAUGHN

CHAPTER 13 TRUSTEE

55 E. Monroe Street, Suite 3850

Chicago, IL 60603

(312) 294-5900

/s/ Tom Vaughn